

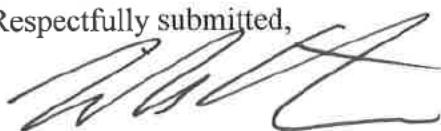
Hon. Henry Pitman
 May 8, 2018
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Event	Current Date ¹	Proposed Date
Requests for Admission to be served	May 1, 2018	August 1, 2018
Close of fact discovery	June 1, 2018	September 7, 2018
Expert reports due (for party bearing the burden of proof)	August 10, 2018	October 12, 2018
Rebuttal expert reports	September 10, 2018	November 9, 2018
Close of expert discovery	October 10, 2018	December 14, 2018
Deadline for parties to attend settlement conference	November 10, 2018	January 15, 2019

We also request that the next Case Management Conference be scheduled for the week of June 11, 2018.

With respect to the schedule proposed by defense counsel, Coventry Capital submits that the parties should aim to complete discovery within the schedule proposed above, and later assess if further extensions are necessary, rather adopting the schedule requested by defense counsel now. We would be happy to discuss this further at the Court's convenience.

Respectfully submitted,



William P. Ashworth

cc: Counsel of Record

¹ See December 7, 2017 Civil Case Management Plan and Scheduling Order (dkt. #36).